## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 1:11-cv-04139-PAC

THE FOLLOWING DOMAIN NAMES:

ROJADIRECTA.ORG, and ROJADIRECTA.COM,

[CORRECTED] CLAIM AND STATEMENT OF INTEREST IN DEFENDANT DOMAIN NAMES

Defendants in rem.

Please take notice that Puerto 80 Projects, S.L.U. ("Puerto 80"), a corporation organized under the laws of Spain, pursuant to 18 U.S.C. § 983(a)(4) and Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, by and through its undersigned attorneys, hereby asserts an ownership interest in, and makes a claim upon, the following domain names identified as defendants *in rem* in the above-captioned case:

ROJADIRECTA.COM, and ROJADIRECTA.ORG

The basis of Puerto 80's interest in in the property is that Puerto 80 is the registrant and owner of the defendant domain names.

## **DURIE TANGRI LLP**

/s/ Johanna Calabria
By:

Johanna Calabria

Mark A. Lemley (*Pro Hac Application to be filed*)
Ragesh K.Tangri (*Pro Hac Application to be filed*)
Johanna Calabria (SBN JC3915)
Genevieve P. Rosloff (*Pro Hac Application to be filed*)
217 Leidesdorff Street
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Attorneys for Claimant PUERTO 80 PROJECTS, S.L.U.

Dated: July 19, 2011

David Spears Charlita Mays SPEARS & IMES LLP 51 Madison Avenue, 25th Floor New York, NY 10010 Tel. (212) 213-6996

Attorneys for Claimant PUERTO 80 PROJECTS, S.L.U.

## VERIFICATION

I, Igor Seoane Miñán personally and on behalf of Puerto 80 Projects, S.L.U., pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the foregoing claims and assertions are true and correct to the best of my knowledge.

Dated this 45 day of July, 2011

PUERTO 80 PROJECTS, S.L.U.

By:

Igor Seoane Miñán, C.E.O.

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 19, 2011, I caused the [CORRECTED] CLAIM AND STATEMENT OF INTEREST IN DEFENDANT DOMAIN NAMES to be served via electronic means, via the Court's ECF system, on all counsel registered to receive electronic notices. I also certify that I have caused copies of the [CORRECTED] CLAIM AND STATEMENT OF INTEREST IN DEFENDANT DOMAIN NAMES to be served by first-class United States mail on the following:

Christopher D. Frey U.S. Attorney's Office, SDNY (St. Andw's) One St. Andrew's Plaza New York, NY 10007

David I. Miller U.S. Attorney's Office, SDNY (St. Andw's) One St. Andrew's Plaza New York, NY 10007

Copies of the [CORRECTED] CLAIM AND STATEMENT OF INTEREST IN **DEFENDANT DOMAIN NAMES** will be served by first-class United States mail on any party identified in the Notice of Electronic Filing as receiving notice by other means.

/s/ Johanna Calabria

JOHANNA CALABRIA

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